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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 * * *

17 **Courtney Cloud,**

18 Case No.: 2:23-cv-00468-JCM-DJA

19 Plaintiff,

20 vs.

21 **Allstate Indemnity Company;** Does 1
22 through 10, inclusive, and Roe
23 Corporations 1 through 10, inclusive,

24 **Stipulation and [Proposed] Order to
25 Extend Deadlines
26 (2nd Request)**

27 Defendants.

28 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto,
29 by and through their respective counsel of record, that the discovery deadlines in
30 this case be extended as follows:

31 **A. COMPLETED DISCOVERY**

32 1. Plaintiff has served her initial disclosures of witnesses and documents, and
33 supplements thereto;

34 2. Defendant Allstate Indemnity Company has served their initial disclosures of
35 witnesses and documents, and supplements thereto;

36 3. Plaintiff has propounded and answered written discovery requests;



1 4. Defendant Allstate Indemnity Company has propounded and answered
2 written discovery requests;
3 5. Plaintiff has taken the deposition of Allstate Employee Sean Owens;
4 6. Plaintiff has taken the deposition of Allstate Employee Christine Fox;
5 7. Plaintiff has taken the deposition of Allstate Employee Jonathan Bourne;
6 8. Plaintiff has taken the deposition of Allstate Employee Rodney Farney;
7 9. Defendant has taken the deposition of Plaintiff Courtney Cloud;
8 10. Plaintiff has noticed the deposition of Allstate Employee Steven Peterson;
9 11. Defendant has noticed the depositions of Plaintiff's Experts;
10 12. Plaintiff and Defendant have disclosed their initial expert witnesses.

11

12 **B. OUTSTANDING DISCOVERY**

13 1. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;
14 2. Depositions of expert witnesses;
15 3. Depositions of fact witnesses;
16 4. Disclosure of rebuttal expert witnesses;
17 5. Additional written discovery;
18 6. Disclosure of additional documents.

19

20 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

21 Counsel for the parties have been diligent in conducting discovery but need
22 additional time to disclose rebuttal expert reports. One of Plaintiff's initial experts is
23 currently dealing with a family emergency which will make it difficult for him to
24 complete his rebuttal disclosure by the deadline of April 8, 2024. Plaintiffs do not
25 expect additional delays.

26 Therefore, there is good cause to extend the discovery deadline as requested. As
27 such, the parties request a 30-day extension of the discovery deadlines.

28



1 **D. PROPOSED EXTENDED DEADLINES**

2 The parties have agreed to extend the discovery deadlines in this case, as follows:

	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	April 8, 2024	May 8, 2024
Close of Discovery	May 6, 2024	June 5, 2024
Dispositive motions	June 5, 2024	July 8, 2024
Pretrial Order	July 8, 2024	August 7, 2024, or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

13 Dated this 20th day of March, 2023.

14 H&P LAW

15 */s/ Marjorie Hauf*

16 Marjorie Hauf, Esq.
17 Nevada Bar No. 8111
18 Cara Xidis, Esq.
19 Nevada Bar No. 11743
20 Attorneys for Plaintiff

13 Dated this 20th day of March, 2023.

14 KEATING LAW GROUP

15 */s/ John Keating*

16 John T. Keating, Esq.
17 Nevada Bar No. 6373
18 Attorney for Defendant



ORDER

IT IS HEREBY ORDERED that following discovery deadlines shall be extended as follows:

	NEW DEADLINE
Motions to amend or add parties	Closed
Initial expert disclosures	Closed
Rebuttal expert disclosures	May 8, 2024
Close of Discovery	June 5, 2024
Dispositive motions	July 8, 2024
Pretrial Order	August 7, 2024

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: 3/22/2024

Submitted by:
H&P Law

/s/ Marjorie Hauf

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